

Hello, and thank you Secretary Moore for sponsoring this Community Forum and listening to our shared concerns for the future of Lake Memphremagog.

My name is Henry Coe, and I am a member of a voluntary citizens' environmental group DUMP (Don't Undermine Memphremagog's Purity) whose members include many Quebec neighbors and allies unable to cross the border and to attend in person. The words may be mine, the ideas are from your neighbors. Among these, we are honored that Robert Benoit, President of Memphremagog Conservation Inc., will share in this program. Robert is a founding member of DUMP and has collaborated with us for three years in fighting for protections of our shared international lake. We welcome Vermonters and Quebecers alike who care and are concerned about the environmental threats to Lake Memphremagog. We thank the ANR Secretary and staff for their interest.

Newport is the Geneva of North America. I was fortunate fifty years ago to hear these words spoken to the Newport City Council by a European-American, Hans Klunder who had come to Newport as a City Planning consultant. I have never been to Switzerland, but I have remembered the image he described of two cities taking advantage of their parallel natural settings on their respective international lakes. At the end of a most interesting evening, Dr. Charles Sherman Jr., Mayor of Newport, quietly said, "Perhaps it is time we turn our city around and begin to face the Lake." Much has happened over the years. Much that is positive continues to happen. Our challenge today is to ask what will Lake Memphremagog be like in another fifty years? Unfortunately, the most important stakeholders to the future of our Lake are not here. They are our grandchildren and their grandchildren. We must think of them.

What brings us here today? The Vermont Agency of Natural resources has labeled Lake Memphremagog as impaired and degraded. Although the ANR Secretary chose not to designate Memphremagog as a Lake in Crisis as petitioned by 3,900 citizens, we are appreciative that she and her staff have come to Newport prepared to discuss and implement a DUMP initiated Response Plan and other actions. As DUMP member, Peggy Stevens wrote in last week's Chronicle,

“The purpose of the Lake in Crisis petition was to bring attention and resources to protect the lake and defend it against environmental contamination evident in the cancerous brown bullhead found in the lake and nowhere else in Vermont. There is no disputing the risk to the environment, the public health, or our local economy, posed by sick fish, blue-green algae blooms, and measurable levels of toxic PFAS chemicals in Sherbrooke’s drinking water earlier this year.”

“The ANR has begun testing fish and water for PFAS - a good start. More must be done to develop a plan to protect the lake. The source(s) of the contaminants causing these serious problems must be pinpointed and effectively dealt with to prevent future damage to water quality. Households, commercial businesses, and industry all contribute hundreds of harmful chemicals, as does landfill leachate.”

Lake Memphremagog is distinct from all other Vermont lakes in three important ways:

FACT: It serves as a drinking water source for 175,000 Canadian citizens.

FACT: 25 to 40% of brown bullhead fish in South Bay and Hospital Cove present with malignant cancers on the flesh and in their organs. This is extremely rare; and is linked to contaminated waters

FACT: It is home to Vermont’s only remaining and permitted private landfill. Most of Vermont’s solid waste ends up in Coventry. An increasing proportion, over 20%, comes from out of state. The landfill produces the equivalent of 5 to 6 semi-tanker truck loads per day of toxic leachate or garbage juice. Over a ten year period, between 36 million and 40 million gallons of toxic leachate were delivered to the Newport Wastewater Treatment Plant. Such municipal plants are designed to treat domestic sewage, not remove toxic chemicals such as PFAS. The contaminated treatment plant effluent was dumped into the Clyde River, a short distance from the Lake.

ANR and Casella maintain that it cannot be proven that toxic landfill leachate is the cause of sick fish. But, we ask, can it be proven not to be the cause in the absence of adequate studies? The short answer is NO, Ev Crundon, writing in Wastedive

magazine in 2020 states that landfill leachate “is an exposure pathway for high concentrations of PFAS” which are harmful to the environment and bio-accumulate in biota and in the food chain. In DUMP’s view, filtration and treatment options for PFAS are too important to society to be left to the private waste industry alone.

Three years ago, area citizens in written comments, overwhelmingly opposed the 51 acre landfill expansion and formed DUMP. When learning of PFAS concentrations nearly six times over the Vermont safe standard for drinking water, in a groundwater well between the landfill and the Black River, DUMP acted to appeal the ANR decision to permit the expansion. While the Environmental Court and the ACT 250 Board did uphold the permit to expand, they did so with important conditions, among them, that a moratorium or ban was placed on treatment of landfill leachate anywhere in the Memphremagog watershed. The Mediation Agreement states no leachate treatment at the Newport plant for four years or until Jan. 1, 2024.

A few words about the elephant in the room before us. The Coventry landfill now occupies 129 permitted acres and operates under a renewable 10 year permit. Hundreds of trucks carrying loads of up to 33 tons of garbage make the daily round trip to empty their contents, uninspected, to add to the size of the artificial trash mountain, known locally as Mt. Casella.

It is sited adjacent to - in fact zero feet from an extremely large wetland complex. Ironically ANR’s Fish and Game Division owns and manages this neighboring 1800 acres, surrounding the landfill on three sides. The South Bay Wildlife Management Area is no longer the important East-West wildlife corridor it once was. This human scar lies within two and a half football fields length from the Lake’s largest tributary, the Black River, and perilously close- within a half mile from South Bay. It is a horrible site for our waste, and one which the EPA would never allow or permit under today’s regulations.

In DUMP’s view this is an environmental accident waiting to happen. Factors to consider include liner leakage to groundwater, storm water run-off from Vermont’s largest continuous impermeable surface, as well as uncaptured methane releases to the

atmosphere. The Casella company has a history of operation and management violations, the latest being the 154,000 gallon leachate spill at the company's Bethlehem, N.H. landfill. A similar spill in Coventry would be an international environmental disaster.

We respectfully call on ANR to end Vermont's dependence on a single landfill distant from population centers. There are alternative sites. The time has come for the state to revive its mandate to develop a comprehensive solid waste plan based on zero waste principles and regional depositories closer to population centers. Do not grant automatic 10 year renewal permits. Let 2018 be the last expansion of the Coventry landfill. Augment liability guaranties and bonds in event of accidents and final closure. Treatment of landfill leachate is too important a public function to allow it to be planned and run by a private for profit corporation.

The Northeast Kingdom, already Vermont's sacrifice zone, is becoming known as Vermont's and, increasingly, as New England's dumping ground. Let the rest of Vermont share the burden. Landfill leachate must be treated elsewhere. No leachate ever in the Memphremagog watershed. This is our prime objective, it is the Canadians' prime objective. We ask you to listen.

You have been patient. Just a few closing, more philosophical remarks:

In our monthly meetings of DUMP volunteers, we have discussed some abiding and positive guidelines.

1. The Precautionary Principle. This principle is enshrined in law in many nations, but not so in the U.S. It says that when scientific evidence is uncertain about an environmental or human health hazard, then no action should be taken until it is demonstrated there is no harmful effect.

2. Act as a respectful neighbor. With three quarters of the northerly flowing Memphremagog watershed in Vermont, yet 80% of the Lake's geography in Canada, we have a high obligation to our northern neighbors to care for this fragile, most

important resource. To allow northerly flowing waters to be polluted by Vermont actions and inaction, is not just unneighborly, it is irresponsible and immoral.

3. The need to Protect the Lake in order to Improve the Lake. We must first do no harm to our surface and groundwater resources. Clean water is life. Do everything to protect it. Apathy is the friend of environmental injustice.

4. No treatment of landfill leachate in the Memphremagog watershed - EVER.

5. Cherish this Lake. Three words imprinted in granite on a bench facing the lake in Pomerleau Park just 300 yards from here. Have you sat on it to contemplate the Lake's beauty? In the words of former Newport Mayor, Charlie Pronto, "Hold this Lake dear. Be thankful that we have such a wonderful resource in our area and fight, as you would for a loved one, NEVER to do anything to harm it. Memphremagog is the lifeblood of our border area. We should always treat it as such."

No leachate ever in the Memphremagog watershed.

We encourage all to keep these guidelines in mind as we work to protect and improve our Lake for future generations.

Thank you. I will now turn the program over to our colleague, Robert Benoit.